



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

December 30, 2020

BY ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *New Jersey, et al. v. Wheeler, et al.*, Case No. 20 Civ. 1425 (JGK)

Dear Judge Koeltl:

This Office represents defendants Andrew Wheeler, in his official capacity as Administrator of the United State Environmental Protection Agency (“EPA”), and EPA in the above-referenced matter. We write respectfully on behalf of all parties to provide the Court with a status update on the parties’ efforts to resolve plaintiffs’ fee application through a settlement. The current deadline for the parties to submit a joint stipulated order setting forth the amount of fees to be awarded is January 4, 2021. *See* ECF No. 48.

The parties have reached a tentative agreement on attorneys’ fees, subject to approval by the relevant authorities and final documentation of the stipulation of settlement. The parties respectfully request an additional fifteen-day extension of all deadlines related to the fee application, set forth in the judgment entered on August 6, 2020 (ECF No. 44), to finalize the settlement.

This is the parties’ third request for an extension of the fee application deadline. The previous requests were granted on October 26, 2020, and December 1, 2020.

We thank the Court for its consideration of this request.

Respectfully,

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